REMARKS

This is intended as a full and complete response to the Final Office Action dated March 29, 2004, having a shortened statutory period for response set to expire on June 29, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-46 are pending in the application and remain pending following entry of this response.

Claims 1-46 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. More particularly, the Examiner has indicated that Applicant's use of the terms "function" and "buffer" throughout the claims renders the claims indefinite. In response thereto, Applicant has amended the claims to address the Examiner's rejection, e.g., by amending "buffer" to "pure value buffer", "function" to "function call", and "function related data" to "parametric function-related data". Applicant submits that these amendments address the Examiner's rejection and that the amended claims are definite. Further, Applicant submits that these amendments do not introduce new matter, and that the amendments were made to address the Examiner's §112 rejection and not to overcome a prior art rejection, and as such, Applicant's submit that the claims are entitled to their full equivalents. Reconsideration of the rejection is respectfully requested.

Claims 1-3, 5-9, 11-19, 22-26, 28-32, 34-42 and 45-46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Andrade et al. (5,265,250). The Examiner takes the position that Andrade teaches, shows, or suggests each and every element of the rejected claims, less that Andrade does not teach flattening data into a pure value buffer. However, the Examiner takes the position that in view of Andrade's disclosure of the typed buffer 127 containing data 131 which may be manipulated by application of program 105, that it would have been obvious to one of ordinary skill in the art to have applied this teaching in Andrade to generate the flattened pure value buffer recited in Applicant's claims. Applicant traverses the rejection and respectfully submits that each of the rejected claims recites subject matter that is not shown, taught, or suggested by Andrade.

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More particularly, Applicant submits that *Andrade* fails to teach, show, or suggest generating a descriptive data structure for parametric function-related data and generating a pure value buffer derived from the parametric function-related data, as recited in independent claims 1, 12, 25 and 35. Although *Andrade* teaches generating a buffer containing a data structure, the data structure in the *Andrade* buffer is described as containing only object oriented data and not parametric function-related data, as recited in Applicant's claims 1, 12, 25, and 35. The distinction between the parametric function-related data of Applicant's invention and the object oriented data of *Andrade* is significant, as the object oriented data of *Andrade* is only applicable to applications running object oriented language based systems, *e.g.*, Windows® type systems, while the parametric function-related data of Applicant's invention is not limited to object oriented language based systems. As such, Applicant's submit that *Andrade* fails to teach, show, or suggest each and every limitation recited in claims 1, 12, 25, and 35 and reconsideration of the rejection of these claims, along with all claims depending therefrom, is respectfully requested.

Additionally, Applicant submits that each of independent claims 1, 12, 25 and 35 further recites the limitation of flattening the parametric function-related data structure and the pure value buffer into a bundle. Although the Examiner concludes that *Andrade's* teaching that typed buffer 127 containing data 131 which may be manipulated by application of program 105 is equivalent to Applicant's recited "flattening" process, Applicant respectfully submits that the Examiner's conclusion is misplaced, as mere "data manipulation" of *Andrade* is not equivalent to Applicant's flattening process. More particularly, the data manipulation described in *Andrade* is simply an application program 105 being allowed to manipulate data resident in system level typed buffer 127, which occurs in all multi-application systems where applications are allowed to access data resident or assigned to other applications. Applicant's flattening process involves generating a pure value buffer, flattening the buffer to optimize the buffer for transmission to a remote node, and then sending the flattened buffer to the remote node for use in executing the function call on the remote node. Applicant's flattening process is distinct from the process of *Andrade* where the buffer remains resident at the system level and is never optimized (flattened) or transmitted to
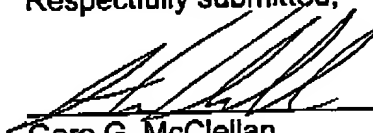
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a remote node. As such, reconsideration of the rejection of claims 1, 12, 25, and 35, along with each claim depending therefrom, is respectfully requested.

Claims 4, 10, 20-21, 27, 33 and 43-44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Andrade et al.* in view of *Pettus* (6,223,217). The Examiner takes the position that *Andrade* teaches each limitation recited in the rejected claims, less determining if the bundle is cached, and retrieving the bundle from cache memory if it is determined to be there. However, the Examiner cites to *Pettus* as teaching determining if a bundle is cached and retrieving the bundle if it is in cache memory. As such, the Examiner concludes that the cited combination of references renders the rejected claims obvious. Applicant traverses the rejection and respectfully submits that the cited combination of references fails to teach, show, or suggest each and every limitation recited in claims 4, 10, 20-21, 27, 33 and 43-44. More particularly, as discussed above, Applicant submits that the cited combination of references fails to teach, show, or suggest generating a descriptive data structure for parametric function-related data, generating a pure value buffer derived from the parametric function-related data, and flattening the parametric function-related data structure and the pure value buffer into a bundle. Reconsideration of the rejection of claims 4, 10, 20-21, 27, 33 and 43-44, along with each claim depending therefrom, is respectfully requested.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the Final Office Action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this Final Office Action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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